

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SUZANNE GREENE,

Plaintiff,

vs.

TYLER TECHNOLOGIES, INC.,

Defendant.

Civil Action No. 1:19-cv-1338-AT

**DEFENDANT'S ANSWERS AND OBJECTIONS TO
PLAINTIFF'S FIRST CONTINUING INTERROGATORIES TO DEFENDANT**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Tyler Technologies, Inc. ("Tyler") serves the following Answers and Objections to Plaintiff's First Continuing Interrogatories as follows:

ANSWER: Tyler objects to this Interrogatory on the grounds that it is vague and ambiguous as to the term “investigations.” Subject to but without waiving the foregoing objections, Tyler refers Plaintiff to its response to Interrogatory No. 9 herein.

INTERROGATORY NO. 12: If You have taken any written (whether sworn or otherwise) or otherwise recorded statements (whether recorded by analog or digital means) from any Person regarding matters at issue in this litigation, please Identify each Person from whom a statement was taken and Describe fully the substance of each statement.

ANSWER: Tyler has not taken any written or recorded statements in this case.

INTERROGATORY NO. 13: Identify all ExecuTime implementation consultants who worked for the Company during the Relevant Time Period.

ANSWER: Tyler objects to this Interrogatory on the grounds that it requests information not reasonably related to the parties’ claims or defenses in this case and that there is no good reason to go beyond the ordinary scope of discovery under Rule 26(b) of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 14: If you contend that Plaintiff has misrepresented, distorted, exaggerated, falsified or been untruthful in communicating any statement (1) to any employee or agent of the Company during the course of her work for the